

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

AUTONOMOUS DEVICES LLC, )  
Plaintiff, )  
v. ) C.A. No. 22-1466-MN  
TESLA, INC., )  
Defendant. )

**STIPULATION AND [PROPOSED] ORDER GRANTING LEAVE TO FILE  
FIRST AMENDED COMPLAINT AND TO AMEND SCHEDULING ORDER**

WHEREAS, Autonomous Devices LLC (“AD”) seeks leave to amend the Complaint (D.I. 1) to (1) dismiss the allegations relating to U.S. Patent Nos. 10,102,449 (’449 patent) and 11,113,585 (’585 patent), and (2) to add allegations relating to U.S. Patent No. 11,663,474 (’474 patent);

WHEREAS, pursuant to the Court's Oral Order dated September 8, 2023 (D.I. 86), the parties met and conferred and reached the following agreements:

1. AD will withdraw the '449 patent and '585 patent without prejudice;
2. The parties have agreed to amendments to the scheduling order and limitations on claims that can be asserted by AD from the '474 patent; and
3. Tesla, Inc. ("Tesla") will not oppose AD's motion for leave to amend the complaint based on these agreements.

IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel for AD and Tesla, subject to the approval of the Court, as follows:

1. Pursuant to Fed. R. Civ. P. 15(a)(2) and D. Del. LR 15.1, AD hereby moves for leave to amend the complaint. The motion is granted. AD may file the First Amended Complaint

attached hereto as Exhibit A (redline pursuant to D. Del. LR 15.1(b) is attached hereto as Exhibit B). The First Amended Complaint shall be filed as a separate docket entry and shall be deemed served upon filing.

2. The '449 patent and '585 patent are dismissed without prejudice.

3. The Scheduling Order (D.I. 25) is amended as follows:

Event	Current Dates	Proposed Dates
Defendant to produce its initial invalidity contentions (¶ 6d) for the '474 patent	9/22/2023	11/7/2023
Joinder of other parties and amendment of pleadings (¶ 2)	9/18/2023	9/18/2023
Exchange list of claim terms and proposed constructions (¶ 10)	10/20/2023	11/14/2023
Document production substantially complete (¶ 8b)	12/1/2023	12/1/2023
The parties must finally supplement, <i>inter alia</i> , the identification of all accused products and of all invalidity references (¶ 13)	12/15/2023	1/13/2024
Fact discovery cut off (¶ 7a)	2/9/2024	2/23/2024
Plaintiff to provide final infringement contentions and identification of accused products (¶ 6e)	3/1/2024	3/4/2024
Defendant to provide final invalidity contentions and identification of invalidity references (¶ 6f)	3/1/2024	3/15/2024
Parties to exchange final validity and non-infringement contentions	3/29/2024	3/29/2024
Submit joint claim construction chart (¶ 10)	4/5/2024	4/5/2024
Serve Plaintiff's opening claim construction brief (20 pages) (¶ 11)	4/26/2024	4/26/2024
Serve Defendant's answering claim construction brief (30 pages) (¶ 11)	5/24/2024	5/24/2024
Serve Plaintiffs' reply claim construction brief (20 pages) (¶ 11)	6/7/2024	6/7/2024
Serve Defendant's sur-reply claim construction brief (10 pages) (¶ 11)	6/14/2024	6/14/2024

File joint claim construction brief (¶ 11); joint letter re: live testimony and amount of time for the claim construction hearing (¶ 12); technology tutorials (¶ 9)	6/21/2024	6/21/2024
Claim construction hearing (¶ 12)	7/12/2024	7/12/2024
Opening expert reports (¶ 7.f.i)	9/13/2024	9/13/2024
Responsive expert reports (¶ 7.f.i)	10/11/2024	10/11/2024
Reply expert reports (¶ 7.f.i)	11/8/2024	11/8/2024
End of expert discovery period (¶ 7.f.iv)	12/6/2024	12/6/2024
Case dispositive motions and opening briefs therefor (¶ 14(a)); Daubert motions and opening briefs therefor (¶ 8.f.iii)	1/10/2025	1/10/2025
Responsive brief(s) for dispositive motions and Daubert motions (¶ 14(a); Local Rule 7.1.2(b))	1/24/2025	1/24/2025
Reply brief for dispositive motions and Daubert motions (¶ 14(a); Local Rule 7.1.2(b))	1/31/2025	1/31/2025
Jury instructions, voir dire, and special verdict forms (¶ 18)	6/6/2025	6/6/2025
Joint proposed pretrial order (¶ 17; Local Rule 16.3(c))	6/6/2025	6/6/2025
Pretrial conference (¶ 17)	6/16/2025	6/16/2025
Jury trial (¶ 19) (9 days*)	6/23/2025	6/23/2025

4. AD is limited to ten asserted claims from the '474 patent to be identified no later than October 8, 2023, and AD will not be permitted to assert any other claims from the '474 patent.

5. AD's final infringement contentions shall assert no more than twenty-five claims.

6. Tesla's final invalidity contentions shall assert no more than twelve prior art references per asserted claim.

*/s/ Emily S. DiBenedetto*

Karen E. Keller (No. 4489)  
Emily S. DiBenedetto (No. 6779)  
SHAW KELLER LLP  
I.M. Pei Building  
1105 North Market Street, 12th Floor  
Wilmington, DE 19801  
(302) 298-0700  
kkeller@shawkeller.com  
edibenedetto@shawkeller.com  
*Attorneys for Autonomous Devices LLC*

Dated: September 14, 2023

*/s/ Cameron P. Clark*

Jack B. Blumenfeld (No. 1014)  
Brian P. Egan (No. 6227)  
Cameron P. Clark (No. 6647)  
MORRIS, NICHOLS, ARSHT  
& TUNNELL LLP  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899  
(302) 658-9200  
jblumenfeld@morrisnichols.com  
began@morrisnichols.com  
cclark@morrisnichols.com  
*Attorneys for Tesla, Inc.*

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2023.

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The Honorable Maryellen Noreika  
United States District Judge